

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States of America

v.

ROLANDO GONZALEZ

Case No. 5:19-MJ-471

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of APRIL 12, 2019 in the county of Webb in the
Southern District of Texas, the defendant(s) violated:

*Code Section*Title 8 United States Code, Section
1324(a)(1)(A)(ii) and (v)(I)*Offense Description*

Did knowingly transport and move, attempt to transport and move, and
 conspire to transport and move within the United States by means of
 transportation and otherwise, an alien who had come to, entered, remained in
 the United States in violation of law in furtherance of such violation, for the
 purpose of commercial advantage and private financial gain.

This criminal complaint is based on these facts:

See attachment "A".

☒ Continued on the attached sheet./S/ Micah J. Sublett*Complainant's signature*Micah J. Sublett, HSI Special Agent*Printed name and title*

Sworn to before me and signed in my presence.

Date: 04/15/2019*Judge's signature*City and state: Laredo, TexasSam Sheldon, U.S. Magistrate Judge*Printed name and title*

ATTACHMENT "A"

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1. On April 12, 2019, Homeland Security Investigations (HSI) Special Agents (SAs) responded to the Laredo North Border Patrol station in Laredo, Texas and conducted post arrest interviews. HSI SAs subsequently arrested Rolando GONZALEZ for violations of 8 USC 1324 (a)(1)(A)(ii) and (v)(I) and initiated an investigation.
2. On April 12, 2019, Sheriff's Deputies with the Webb County Sheriff's Department encountered Rolando GONZALEZ and four (4) UDAs after a traffic stop. Assistance was requested from the United States Border Patrol (USBP). Border Patrol Agents (BPAs) responded to the call for assistance and performed an immigration inspection on all subjects and subsequently transported Rolando GONZALEZ and four (4) undocumented aliens (UDAs) to the Laredo North Border Patrol station for interviews and processing.
3. HSI SAs were notified, arrived at the Laredo North Border Patrol station and conducted interviews. HSI SAs advised Rolando GONZALEZ of his Miranda rights in the English language, which he verbally stated he understood and was willing to talk to HSI SAs without an attorney present.
 - Rolando GONZALEZ stated that he was contacted by the person he works for in San Antonio and instructed to drive down from San Antonio to transport UDAs. GONZALEZ stated that he "assumed" the people he was transporting were UDAs. GONZALEZ stated four (4) UDAs were dropped off at the Pilot Travel Center in Laredo, Texas. GONZALEZ stated that he picked these four (4) UDAs up and was transporting them to a "stash house" in Laredo, Texas when was encountered Webb County Sheriff's Deputies. GONZALEZ also stated he was to be paid \$250 United States Dollars (USD) for each of the UDAs he transported. GONZALEZ also stated that the UDAs were to be moved later that day or Monday in another vehicle, and that he (GONZALEZ) acts as an organizer for the transportation of UDAs. GONZALEZ stated he told the UDAs to get in and get down once they got into the van he was driving.
4. Four (4) individuals are being held as material witnesses and admitted to illegally entering in the United States by crossing the Rio Grande river to then be smuggled to various locations within the United States for between \$2,000 USD and \$3,000 USD. Mexican nationals Jose Luis CONTRERAS-Sanchez, Norberto CHAGOYA-Chagoya,

Juan Antonio GARCIA-Delgado and Juan Jose CHAGOYA-Luna, are being held as material witnesses in the case against GONZALEZ.

- Jose Luis CONTRERAS-Sanchez stated he made arrangements to be smuggled into the United States with a man known as “Salume”, for \$2,000 USD, \$1,000 of which he has already paid. CONTRERAS-Sanchez stated he departed his home in Guanajuato, Mexico on April 1, 2019. CONTRERAS-Sanchez stated that he crossed the Rio Grande River in a raft on April 9. CONTRERAS-Sanchez stated that his destination was San Antonio, Texas. CONTRERAS-Sanchez stated he was picked up the morning of April 12, 2019 by a gray van. CONTRERAS-Sanchez was shown a six (6) person photographic array and was unable to identify anyone in the lineup but did describe the driver of the van as a light skinned male that had tattoos on his arms and wearing a cap.
- Norberto CHAGOYA-Chagoya stated he made arrangements to be smuggled into the United States with an unknown person in Guanajuato, Mexico for \$2,000 USD and he was to pay \$1,000 when he arrived in San Antonio, Texas. CHAGOYA-Chagoya stated departed his home in Guanajuato, Mexico on April 7, 2019. CHAGOYA-Chagoya stated he crossed the Rio Grande River in a raft on April 12, 2019. CHAGOYA-Chagoya stated his destination was Chicago, Illinois. CHAGOYA-Chagoya stated he was picked up the morning of April 12, 2019 by a green van and that there were four people in the van. CHAGOYA-Chagoya was shown a six (6) person photographic array and was unable to identify anyone in the lineup but did describe the driver of the van as having light skin and who was wearing a red shirt and a cap. CHAGOYA-Chagoya stated he believed he was being transported to San Antonio, Texas while he was in the van.
- Juan Antonio GARCIA-Delgado stated he made arrangements to be smuggled into the United States with an unknown person in Mexico for \$3,000 USD, \$2,000 of which he has already paid. GARCIA-Delgado stated he departed his home in Guanajuato on April 11, 2019. GARCIA-Delgado also stated he crossed the Rio Grande River in a small boat on April 12, 2019. GARCIA-Delgado stated his destination was San Antonio, Texas. GARCIA-Delgado stated he was picked up the morning of April 12, 2019 by a gray van. GARCIA-Delgado stated that the driver of the van had on a black cap. GARCIA-Delgado stated he thought he was being transported to San Antonio, Texas while he was in the van.
- Juan Jose CHAGOYA-Luna stated he made arrangements to be smuggled into the United States with an unknown person in Guanajuato, Mexico to be smuggled into the United States for \$3,000 USD, \$2,000 of which he has already paid.

CHAGOYA-Luna stated he left his home in Guanajuato, Mexico on April 7, 2019. CHAGOYA-Luna stated he crossed the Rio Grande River in a boat on April 12, 2019. CHAGOYA-Luna stated his destination was Austin, Texas. CHAGOYA-Luna stated he was the driver of the van, who was wearing a cap, told them to get in, get down, put their heads down and lay down. CHAGOYA-Luna stated he believed he was going to San Antonio, Texas while he was in the van. CHAGOYA-Luna

5. Rolando GONZALEZ is a light skinned male who has extensive tattoos on both of his arms. GONZALEZ also had a black and gray baseball cap in his possession at the time of his arrest and was encountered by Webb County Sheriff's Deputies driving a gray Ford van. The baseball cap was seized as evidence.